

ATTACHMENT 1

DOAH-Record on Appeal (A)

(5/97)

**APPEAL TO THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT**

**March for The People Agenda by
John W Metz**

Plaintiff(s),

v.

CITY OF CHICAGO, a Municipal Corporation, **et al.**

Defendants

**FROM THE CITY OF CHICAGO, ILLINOIS
DEPARTMENT OF ADMINISTRATIVE HEARINGS
CONSUMER AFFAIRS HEARINGS DIVISION**

CITY OF CHICAGO, a Municipal Corporation,
Department of **CONSUMER SERVICES**

Petitioner,

v.

**March for The Peoples Agenda by
John W. Metz**

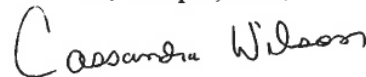
Respondent.

24PA000003

CERTIFICATION OF RECORD

I, Cassandra Wilson, keeper of the records of the City of Chicago Department of Administrative Hearings, CONSUMER AFFAIRS HEARINGS DIVISION, do hereby certify the attached 43 pages to be a true, perfect and complete copy of the *Record* in the above captioned matter before the City of Chicago Department of Administrative Hearings, CONSUMER AFFAIRS HEARINGS DIVISION.

In witness whereof, I have hereto set my hand
this 4 day of April, 2024.



Cassandra Wilson

City of Chicago, Department of Administrative Hearings
740 N. Sedgwick St., 6th Fl., Chicago, IL 60654
312-742-8200

24PA3 File-000001

Frank Lombardo

From: Frank Lombardo
Sent: Friday, February 16, 2024 2:55 PM
To: daniel@first-defense.org; [REDACTED] Matthew Spahr; Christopher Dionne
Cc: Thomas Doran; Anthony Rizzo
Subject: 24PA000003 Order
Attachments: 24PA000003.docx

Attached

Counsel Daniel Massoglia, please forward to your co-counsels as I do not have their email addresses.

Thanks

The proposed parade route is described as: "At 2:30 we will exit Union Park on the Ashland side and walk down Ashland to Adams. We will then turn right (west) on Adams and walk to Damen, turning right (north) onto Damen we will walk to Washington and turn right (east) onto Washington, entering Park #578, arriving around 3:00pm. At 3:30 pm, we will exit Park #578 onto Wolcott, walk south to Washington, turn left (east) on Washington, and walk east on Washington to 1412 W Washington Blvd., Chicago, IL 60607. After a brief stop, we will turn around and head west down Washington back to Union Park. We will Disperse from Union Park at 4:30 pm."

The estimated participants are 1,000+ and the number of units in the parade for Floats is "0", for Vehicles "0", and for Marching Groups is "0".

This application for permit was Denied by letter to the applicant dated February 1, 2024. (City Ex 4) The February 1, 2024, letter to the applicant states that "Pursuant to subsections 10-8-330(d)(1), 10-8-330(d)(3) and 10-8-330(d)(4) of the Municipal Code of Chicago, your application dated January 30, 2024, for a parade on August 22, 2024, is disregarded and denied for the following reasons:"

The letter then lists the above code sections and provides a word for word copy of the language for each code section.

The Denial of this application was appealed to the Department of Administrative Hearings and is the subject of this hearing.

Authority:

The Department of Administrative Hearings has the authority to hear this matter pursuant to Municipal Code Section 10-8-330(l)(1). An application for a parade permit was filed with the Department of Transportation on January 30, 2024. (City Ex 3) The Department of Transportation denied the application and provided notice of that action to the applicant on February 1, 2024. (City Ex 4) An appeal of the denial was timely filed with the Department of Administrative Hearings on February 7, 2024 and therefore authority to hear the matter is properly established.

Hearing:

The hearing on this matter was conducted on February 14, 2024.

At the beginning of the hearing counsels for each party identified themselves for the record. Assistant Corporation Counsel Matthew Spahr and Assistant Corporation Counsel Christopher Dionne for the City and Daniel Massoglia, Madelin Townsend, and Jacqueline Spreadbury for the applicant.

Preliminary matters:

Counsel for the applicant indicated that the City served a Notice of Motion and Motion to Limit the Scope of the Hearing late in the afternoon on February 13, 2024, and that because of that they would move for a continuance to respond and prepare in a different manner. The City's Motion was not presented at the hearing, rather as the Procedural Rules for the Conduct of Administrative Hearings limits prehearing motions to motions for Discovery, Subpoenas, and Continuances, the City was asked to give a summary of the Motion and the applicant provided a response. The City indicated that it wanted clarification that the hearing was only going to address the denial of the January 30, 2024, application and not the basis of the denial of the January 10, 2024, application because in the request for hearing the applicant attached both

applications and both denial letters. The applicant was asked to clarify which denial was being appealed and the applicant answered that it knew that the date to appeal the January 22, 2024, denial was passed and acknowledged that the appeal was for the February 1, 2024, denial. However, the applicant expressed concern that it had to alter its strategy based on the City's Motion and that it would need a continuance if the City's motion was Granted.

Based on the clarification the City's Motion was not considered.

The Applicant then moved for a continuance based on Good Cause. Applicant provided oral reasons to establish Good Cause. The City responded. The reasons were considered, and it was determined that good cause was not established and the Motion to Continue was Denied.

The Applicant made an oral motion for subpoenas for certain individuals to testify and ruling on that motion was reserved pending testimony of present witnesses.

Opening Statements presented.

Testimony:

The City's only witness in this matter was Bryan Gallardo. Mr. Gallardo is the Assistant Commissioner of the City of Chicago Department of Transportation Public Way Permitting Office and has held that office since October 2017. His job duties include reviewing parade applications. He identified applications received from the applicant and the notice letters sent in response. The applications and letters were admitted into evidence without objection from applicant.

Mr. Gallardo testified that he compared the applications dated January 10, 2024, and January 30, 2024 and noticed that other than the date and a slight change to the name everything appeared to be the same on both applications.

Under cross examination Mr. Gallardo testified that the January 30, 2024, application was denied because it was duplicative of a prior application. Counsel inquired whether Mr. Gallardo did an analysis of traffic data for the two dates in his determination of the duplicative nature of the applications. The City objected to the question based on it not being within the scope of direct examination and relevance and the objection was sustained. Mr. Gallardo testified that the second application was denied because it was duplicative of the first application.

Questions were asked concerning the three listed grounds for denial contained in the denial letter. Mr. Gallardo testified that the reasons listed are what is provided for in the code and that he is required to apply the code. Mr. Gallardo was questioned about his interpretation of the terms "similar in theme or units" in determining whether an application is duplicative. He provided a description of different parade "themes" and examples of "units". Mr. Gallardo stated that he did not reach out to the applicant to ask whether the second application was for a different theme.

Several questions were asked concerning the basis of the denial of the first application that were objected to and sustained. For reasons of judicial efficiency, it was agreed that all questions concerning the denial of the first application would have a standing objection and would have a standing ruling of sustained. Counsel for the applicant was given an opportunity to make a record concerning the basis for constitutional violations for void for vagueness, as applied, and criminal penalties.

Counsel for applicant renewed his motion for subpoenas and was asked to establish the relevance of the anticipated testimony. Motion for subpoenas denied as testimony would not be relevant.

After several additional questions concerning the review process for hypothetical applications or past applications, cross examination was concluded. The witness was dismissed subject to recall.

The City rested.

Applicant called its first witness Kobi Guillory.

Mr. Guillory stated that he is a member of the "Alliance". He is also involved with the coalition for the March on the DNC. Mr. Guillory testified about the issues supported by the coalition and the "Alliance". He testified that he submitted the application for the parade permit for a parade on August 19, 2024. He also submitted the application for the August 22, 2024 parade. Mr. Guillory stated that he wanted the parade on August 19, 2024, so that his coalition could make their seven demands known to the DNC. The witness answered additional questions concerning the application dated January 10, 2024 and discussions with the Department of Transportation about that application. The police did not contact him about that application. The application for the August 22, 2024 parade was presented to the witness and he stated that the decision to march during the week of the Convention was made around November 19, 2024, and that the decision was made to march on both dates as two separate protests. Mr. Guillory testified that he did not know that the permit to march on August 19, 2024 was denied when the application for the August 22, 2024 permit was filed and that he intended to March on both dates. When asked if the intended message to be conveyed at both parades was to be the same, Mr. Guillory testified that they were assuming, based on the way the Democratic Party has responded to marches that have occurred before, that the demands would not have been met between the 19th and the 22nd so they would be refreshing those demands and also it would be after four days of discussion so they would have some updates.

Two additional questions concerning the penalty provisions in section (s) were objected to and the objections were sustained.

Counsel then offered an affidavit from a witness that was not present. The City objected. The affidavit was allowed into the record but not admitted into evidence and not considered in this decision.

Additional questions concerning the application to the Park District for permits were asked and answered and then the direct examination was concluded.

Cross examination was conducted concerning the date of the denial of the January 10, 2024 application and the filing of the January 30, 2024 application. The witness testified that he did not know of the denial of the January 10, 2024, application at the time of the January 30, 2024, application. Cross examination was concluded.

Mr. Guillory was recalled by applicant.

On recall Mr. Guillory was asked about a permit application in 2023. He was shown City's Ex 1 and verified that the date on the application was August 7, 2023. He was then asked about applications filed in January. He testified that applications for parades in the next year can not be filed in the current year unless they are for a parade in January. Applications for dates later than January must be filed in the current year. Applications are considered on a first come first served basis. Examination was concluded.

Applicant next called Joe Iosbaker.

He stated that he is a member of "Alliance". He has been a member for ten years. Mr. Iosbake is a member of the decision-making process for the coalition. He testified that the coalition did not intend to only march on one day. They intended to march on multiple days but initially they intended to march on only one day but as the events developed in Gaza they decided to march on a second day. He believes that the August 22, 2024, parade was not permitted because it was duplicative, but he doesn't really understand what that means. He states that the coalition intended to also march on August 22, 2024 and that the August 22, 2024 march was not a repeat of the August 19, 2024 march.

He stated that he has experience with marches and parades. He stated that he wanted a parade permit to ensure safety and to make the event family friendly.

Direct examination concluded. No cross examination.

Counsel for applicant stated that they want to introduce evidence that the Police did not talk to their client and that the Police have talked to other applicants. City objected. Objection sustained.

Closing arguments presented.

Discussion:

The City asserts that the denial of the application dated January 30, 2024 was proper pursuant to section 10-8-330(d)(4).

Section 10-8-330(d)(1) establishes the behavior or conduct that is prohibited.

No person or organization may submit more than one application for the same parade date and route, or for a parade substantially similar in theme or units described but requesting an alternate date or route, whether using the same name, different names, or different affiliations that the person or organization may control or be a member of.

Section 10-8-330(d)(3) describes the consequences to a person or organization that violates section 10-8-330(d)(1).

Where a person or organization submits multiple applications for the same parade date and route or for a parade substantially similar in theme or units described but requesting an alternate date or route, whether by using one name or multiple names, that person or organization shall not be eligible for such a permit and shall be in violation of this ordinance.

Section 10-8-330(d)(4) authorizes the commissioner to take certain actions to enforce section 10-8-330(d) and establishes the applicant's right to appeal the commissioner's actions thereunder.

The commissioner is authorized to disregard any such multiple applications and to deny any permit on the basis of a violation of this subsection (d). Any applicant who disagrees with the commissioner's actions hereunder may appeal, in the manner set forth in subsection (l).

The City's argument is that if a side-by-side comparison of applications submitted by the same person or organization shows that the parades are substantially similar in theme or units described even if requesting different dates or routes or using different names the commissioner is authorized the disregard the application and deny the permit.

The City's Assistant Commissioner for the Department of Transportation Public Way Permitting office testified that he conducted such a comparison of applications and determined that they were for parades that were substantially similar in theme and units because they were both protest parades; they had very similar names with only a slight change by adding the date 08/22/24 on the second application; that the sponsoring organization was the same; that the parade routes were identical; and that the estimated participants was also identical. A review of City exhibits 1 and 3 discloses that the parade organizer / applicant on both is Kobi Guillory; that the parade assembly, disbandment, start, and end times are identical; that the assembly and disband location is identical; and that the participating units are described in each as "0".

The applicant contends that the City violated its Constitutional rights by denying the parade permit because the ordinance is unenforceable due to vagueness; that the denial was based on content rather than objective standards; that its due process rights were violated because the City did not follow its own procedures; and for other reasons that were presented. The applicant was provided wide latitude to establish a record of the grounds for its constitutional arguments, however, as the Administrative Law Judge does not have the authority to declare an ordinance unconstitutional either on its face or as applied, the determination here is not based on those grounds.

Constitutional issues aside, the applicant contends that the denial was not proper because the City failed to conduct an investigation as required in section 10-8-330(f) or provide the reasons for the denial as contained in section 10-8-330(g) after conducting such an investigation. The applicant contends that its intention was to conduct two marches on separate dates with different themes and that the applications for each parade should have been investigated individually.

Section 10-8-330(f) requires the commissioner to investigate the facts in an application.

The Commissioner shall investigate the facts set out in the application in consultation with the police department, which shall be sent copies of the application immediately upon receipt. Where the commissioner determines that additional information the factors set forth in subsection (g)(1) – (5) is required, copies of the application and a request for such information also shall be sent to any appropriate city department...

Section 10-8-330(g) requires the commissioner to issue a permit when the investigation establishes certain conditions.

After such investigation, the commissioner shall issue a permit when the commissioner finds that:

1. The parade will not substantially or unnecessarily interfere with traffic in the area...
2. There are available at the time of the parade a sufficient number of on-duty police officers to police and protect participants and non-participants...
3. The concentration of persons, animals, vehicles or other things at the assembly and disbanding areas and along the parade route will not prevent proper fire and police protection or ambulance service
4. The parade will not interfere with the use of the requested area by another party to whom a valid permit has been issued...

5. The parade will not be conducted for any purpose or in any manner made unlawful elsewhere in the code or by any other local, state, or federal law
6. The application contains sufficient information about the person or organization applying for the permit, the parade organizer, and the purposed date, time, location, route and number of participants

The facts in this matter are not at issue.

The applicant filed an application on January 10, 2024, and a second application on January 30, 2024. The City denied the first application on January 22, 2024, and the second application on February 1, 2024. The second application was denied as being substantially similar in theme or units described as in the first application in violation of 10-8-330(d).

A determination of this matter depends on the interpretation of section 10-8-330.

A review of section 10-8-330 discloses that definitions are provided in subsection (a); that a permit is required for a parade on any portion of the public way in subsection (b); and that when such applications shall be filed is established in subsections (c). The next subsection (d) establishes restrictions on the number of applications that can be filed by a person or organization for the same parade date and route or for parades that are substantially similar in theme or units described. Subsection (e) concerns the contents of the application. Subsections (f) and (g) establish that the commissioner shall investigate the facts of an application and that a permit shall be issued when certain conditions are determined. Subsection (h) describes when applications shall be processed. Subsection (i) deals with "traditional parades". Subsection (j) provides noticing requirements; subsection (k) requires that when an application is denied an alternate permit shall be authorized; and subsection (l) establishes an appeal process for applicants when their application is denied. Subsections (m), (n), (o), (p), (q), and (r) deal with technical issues of an issued permit. Finally, subsection (s) establishes penalties for violations of any provision of the section.

Based on a review 10-8-330, it is my interpretation of the law that if the Department of Transportation, after a review of applications for parade permits determines that on their face they are for the same date and route or are substantially similar in theme or units described, then that is a violation of subsection (d)(1) and therefore under subsection (d)(4) the commissioner is authorized to disregard the applications and deny any permit.

It is also my interpretation of the law in subsection (d)(4) that to "disregard" the application and to "deny" any permit means that the investigation pursuant to subsection (f) and the issuance of a permit pursuant to subsection (g) are not required for applications that are in violation subsection (d)(1).

Findings:

It is my finding that the City of Chicago Department of Transportation reviewed the applications filed on January 10, 2024, and on January 30, 2024, and properly determined that they were substantially similar in theme or units described. Therefore, based on my interpretation of the law, the denial of the application filed on January 30, 2024, was proper.

Further, the applicant's contention that the parades were for two separate marches with different themes is contradicted by its own witness. When asked if the intended message to be conveyed at both parades was to be the same, Mr. Guillory testified that they were assuming, based on the way the Democratic Party has responded to marches that have occurred before, that the demands would not have been met between the 19th and the 22nd so they would be refreshing those demands and also it would be after four days of discussion so they would have some updates. This clearly establishes similar themes for both parades. Also, City's exhibits 1 and 3, the applications that were filed, clearly indicate that the units participating in the parade were not only similar but were identical.

I find that the City of Chicago has established by a preponderance of the evidence that the application for a parade permit filed January 30, 2024, was properly denied.

Decision:

The Denial of the application for a parade permit by the Department of Transportation is AFFIRMED.

Entered: *Frank Lombardo*
Administrative Law Judge
Frank Lombardo

February 16, 2024
Judge #49

2/12/24, 10:04 PM ,

Gmail - MARCH ON THE DNC 2024 8-19-2024



Coalition Ex. 2

Kobi Guillory <guillorykobi@gmail.com>

MARCH ON THE DNC 2024 8-19-2024

2 messages

Susan Pawlak <Susan.Pawlak@cityofchicago.org>

Tue, Jan 16, 2024 at 2:47 PM

To: [REDACTED]

Cc: Bryan Gallardo <Bryan.Gallardo@cityofchicago.org>

Hello Mr. Guillory,

Per your request explained in this email, Closing Ashland at this location would be a problem for emergency access to the hospitals. Please submit a modified route.

Thank you,

Susan Pawlak
Department of Transportation
312-744-4699

This e-mail, and any attachments thereto, is intended only for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of this e-mail (or the person responsible for delivering this document to the intended recipient), you are hereby notified that any dissemination, distribution, printing or copying of this e-mail, and any attachment thereto, is strictly prohibited. If you have received this e-mail in error, please respond to the individual sending the message, and permanently delete the original and any copy of any e-mail and printout thereof.

Kobi Guillory <[REDACTED]>

Thu, Jan 18, 2024 at 7:07 AM

To: Susan Pawlak <Susan.Pawlak@cityofchicago.org>

Cc: Bryan Gallardo <Bryan.Gallardo@cityofchicago.org>

Good morning Ms Pawlak

When we've marched from Union Park before, we only used two lanes of Ashland, which allowed emergency vehicles to pass through. Would there still be a problem with the route if we only used half of Ashland?

Best,
Kobi Guillory
[Quoted text hidden]

24 PA 000003

Affidavit of Grace Patino
Administrative Hearing No. 24 PA 000003

**IN THE CITY OF CHICAGO, ILLINOIS
DEPARTMENT OF ADMINISTRATIVE HEARINGS**

In Re: Parade Application for
March on the DNC 2024

No. 24 PA 000003

AFFIDAVIT OF GRACE PATINO IN SUPPORT OF APPEAL

I, **Grace Patino**, pursuant to the applicable section(s) of the Illinois Code of Civil Procedure, Section 5/1-109 of the Illinois Code of Civil Procedure, and under penalties of perjury, swear, affirm and certify that I have knowledge of the facts set forth in this affidavit and if called upon to testify that I could competently state as follows and that the facts contained herein are true to the best of my recollection, except as to those facts which are alleged to be upon information and belief, and as to those allegations, I hereby certify that I believe the same to be true:

1. I am over the age of 18, have personal knowledge of all items contained herein, and if called to testify as to their contents, would be competent to do so.
2. I am a member of the Chicago Alliance Against Racist and Political Repression ("CAARPR").
3. CAARPR is a part of a broader group of organizations and individuals organizing around the Democratic National Convention in Chicago, collectively called the Coalition to March on the DNC 2024 ("Coalition").
4. I have authority to speak on behalf of CAARPR and the Coalition with regard to this appeal.
5. I worked with other members of CAARPR and the Coalition to apply for parade permit applications to march against the Democratic National Convention ("DNC"). Specifically, I helped fill out applications, which were signed by Kobi Guillary, another member of CAARPR and the Coalition, and I also mailed the applications to the Chicago Department of Transportation ("CDOT").

Coalition Ex 3

For the record but
not Admitted as evidence. If
2-17-24

Affidavit of Grace Patino
Administrative Hearing No. 24 PA 000003

6. The first application I submitted was in August of 2023. This application was returned to me with a hand-written post-it note informing me that the City was “not accepting 2024 applications until the middle of January, 2024” and to re-send the application “about the second week in January.” A true and correct copy of this correspondence that I received from the City is attached to this Affidavit as Appendix 1.
7. Consistent with the City’s instructions, I gave this original permit application to a colleague, unchanged, in January 2024, to submit. Also in January 2024, I separately submitted a different permit application for a different day of the DNC.
8. I intended these two January 2024 applications to be separate and distinct, as the Coalition intends to march against the DNC 2024 on both the opening day of the convention (August 19, 2024), as well as the closing day of the convention (August 22, 2024).
9. These marches are intended to be separate and distinct marches, with unique political messages each time.
10. In November of 2023 and January of 2024, we separately and independently applied for separate use permits with the Chicago Park District for the different events we were organizing on August 19, 2024 and August 22, 2024, hopefully in conjunction with these marches.
11. CAARPR intends to speak out against the DNC and use our First Amendment right to speak, protest, associate, and have our voices heard. Protesting on multiple days of the DNC is particularly important now given the ongoing genocide in Gaza and the mass support of Palestinians.
12. I caused an application for a parade permit to be made on or about 1/7/2024 on behalf of March on the DNC 2024 for a parade on August 19, 2024, which is the opening day of the DNC. (“2024 Parade Permit Application #1”). This was an identical copy of the August 2023 application that I sent too early.
13. I applied for a separate and distinct parade permit on or about 1/22/24 on behalf of March on the DNC 2024 for a parade on August 22, 2024, which is the closing day of the DNC. (“Parade Permit Application #2”).
14. My applications are not “substantially similar” as referenced in the Chicago Municipal Code. The activities of the convention are also separate and distinct on each day, with the

Affidavit of Grace Patino
Administrative Hearing No. 24 PA 000003

first an assembly of attendees and the last the formal nomination of a candidate. Our protest message would serve different political goals each day.

15. I am confused by the language in Chicago Municipal Code 10-8-330(d)(1), (3), as to what makes a parade application “substantially similar.”

16. Further, because the Chicago Municipal Code Parade section provides for civil fines and criminal penalties for a violation, including the submission of a “substantially similar” and allegedly duplicative application, I am nervous about potentially applying for a different parade related in any way to the DNC in the future.


17. I am unable to attend the hearing on February 14, 2024 due to prior work obligations.

FURTHER AFFIANT SAYETH NOT.


Grace Patino 02/13/24
Date

Verification By Certification According to 735 ILCS 5/1-109

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies as aforesaid that she verily believes the same to be true.


Grace Patino 02/13/24
Date

Appendix 1

HELLO, TRIED TO CALL YOU REGARDING
THE ENCLOSED APPLICATION. (9-11-23)
WE ARE NOT ACCEPTING 2024
APPLICATIONS UNTIL THE MIDDLE
OF JANUARY, 2024. PLEASE RE-SEND
ABOUT THE SECOND WEEK IN JANUARY
AND ALSO YOUR CHECK IS NOT FILLED
OUT COMPLETELY. THANK YOU.

24PA000003, City Ex



APPLICATION ONLY - NOT A PERMIT
Application for a Parade Using the Public Way



Application Must Be Submitted 15 Business Days Before Event

Deliver in person or by certified mail to:

CITY OF CHICAGO - DEPARTMENT OF TRANSPORTATION
 ATTN: PUBLIC WAY PERMIT OFFICE
 CITY HALL, ROOM 905
 121 N. LA SALLE STREET, CHICAGO, ILLINOIS 60602

DATE: 08/07/2023

APPLICATION NO.: 24-24 APPLICATION FEE: \$50⁰⁰

A non-refundable processing fee of \$50.00 must accompany the application for a parade permit unless an application for a waiver of the fee has been granted per Chicago Municipal Code section 10-8-330(r).

1. Name of Parade: March On the DNC 2024

Traditional Parade as defined by section 10-8-330? () Yes (X) No

2. Requested Date for Parade: 08/19/2024

3. Sponsoring Organization (or Individual): Chicago Alliance Against Racist and Political Repression

Address: 6353 S Cottage Grove Avenue, Chicago, IL 60637

24-Hour Contact Number: 773-553-0179

Organization's Leader(s)/Representative(s): Kobi Guillory

4. Name of Parade Organizer/ Applicant: Kobi Guillory

Address: [REDACTED]

Email Address: [REDACTED] Fax Number: [REDACTED]

24-Hour Contact Number [REDACTED]

5. Time Parade will start: 2:00 pm

Estimated time Parade will end*: 4:00 pm

* Per section 10-8-330(o)(1), a parade shall be no longer than 2 hours and 15 minutes, except as provided under the ordinance.

6. Time Parade will begin to assemble: 12:00 pm

Time Parade will begin to disband: 4:30 pm

24PA000003, City Ex 1

7. Location and exact street address of assembly area: Union Park, 1501 W Randolph St, Chicago, IL 60606

Location and exact street address of disbanding area: _____

Union Park, 1501 W Randolph St, Chicago, IL 60606

Permit obtained from property owner to use assembly/disbanding area?

() Yes

() No

(X) Not Applicable

8. Proposed Parade Route (including sidewalks or lanes of traffic parade will occupy): _____

At 2:30 we will exit Union Park on the Ashland side and walk south down Ashland to Adams. We will then turn right (west) on Adams and walk to Damen, turning right (north) onto Damen we will walk to Washington and turn right (east) onto Washington, entering Park #578, arriving around 3:00pm. At 3:30 pm, we will exit Park #578 onto Wolcott, walk south to Washington, turn left (east) on Washington, and walk east on Washington to 1412 W Washington Blvd., Chicago, IL 60607. After a brief stop, we will turn around and head west down Washington back to Union Park. We will Disperse from Union Park at 4:30 pm.

9. Estimated Number of Participants: 1,000+

Basis for this estimate: _____

10. Number of units participating in the parade:

Floats: 0

Vehicles: 0

Marching Groups: 0

11. Will animals participate in the parade? () Yes (X) No

If so, what type of animals and how many?* _____

Service animal may be present.

*Participation of animals in a parade is governed by section 10-8-330(n)(2) of the Chicago Municipal Code.

12. Description of any sound amplification or other equipment that is on wheels or too large to be carried by one person, and a description of the size and dimension of any sign, banner, or other attention-getting device that is too large to be carried by one person:

13. Ward(s) involved: 27

24PA 000003, City Ex 1

TERMS AND CONDITIONS

Per section 8-4-120 of the Chicago Municipal Code, the applicant must promptly reimburse the City for any and all damage of any kind to any property of the City which may result from the use by the applicant of the City's premises under the permission granted herein, and the applicant further agrees that it will not hold liable the City for or on account of any losses or damage to property owned by it or controlled by the applicant or for or on account of any loss or damage sustained by the applicant as a result of injuries to employees or agents of the applicant.

For large parades, as a condition of the permit, it is required that the parade organizer: (1) obtain a \$1,000,000.00 commercial general liability insurance policy, naming the City as an additional insured; (2) indemnify the City against any additional and uncovered third party claims against the City arising out of or caused by the parade; and (3) agree to reimburse the City for any damage to the public way or to City property arising out of or caused by the parade.

Any person violating any of the provisions of section 10-8-330 of the Municipal Code of Chicago, shall be fined not less than \$200 nor more than \$1000 or may be subject to incarceration for up to ten days or both. In addition to any other penalty or fine provided, any person who sells or transfers a permit granted under this section shall be barred from applying for another such permit for a period of three years.

If applicant is applying on behalf of an organization, applicant warrants that he/she has authority to bind the organization listed in line 3 above. If applicant does not have such authority or if no organization is involved, applicant agrees that this application is made on his/her own behalf and is binding on applicant.

Any change in information on this application shall be reported to the Commissioner immediately.

Signature:  Date: 08/07/2023

Printed Name: Kobi Guillory

Title/Position(if any): Co-Chair

Telephone number: [REDACTED] E-Mail Address: [REDACTED]

24PA000003, City Ex 2



CHICAGO DEPARTMENT OF TRANSPORTATION
CITY OF CHICAGO

January 22, 2024

March on the DNC 2024
C/O Kobi Guillory
6227 S Langley
Chicago, IL 60637

Dear Mr. Guillory,

Pursuant to subsection 10-8-330(g) of the Municipal Code of Chicago ("Code"), your application dated January 8, 2024, for a parade on August 19, 2024, is denied for the following reasons:

1. Under section 10-8-330(g)(1) of the Code, the Commissioner finds that the proposed parade will substantially and unnecessarily interfere with traffic in the area contiguous to the activity, and there are not available at the time of the proposed parade sufficient city resources to mitigate the disruption.
2. Under section 10-8-330(g)(2) of the Code, the Commissioner finds that there are not available at the time of the parade a sufficient number of on-duty police officers, or other city employees, authorized to regulate traffic, to police the public, and to protect parade participants and non-participants from traffic-related hazards because of the other requirements for police protection during the time of the proposed parade.

The Commissioner's decision is based on a number of factors, including, but not limited to the following: on the week in question, Chicago will host the 2024 Democratic National Convention (DNC), a large presidential nominating convention that will involve the attendance of delegates from all 50 states, the District of Columbia, and U.S. territories. Additionally, many high-level protectees, including President Biden, and other political leaders will attend the convention. Motorcades for DNC attendees will create significant traffic impediments and safety issues that will not permit the proposed parade route to occur. Moreover, the proposed parade route winds through the city center on a day many attendees are expected to arrive and would create significant traffic concerns and a drain on existing police resources. Movement of up to 50,000 delegates, staff, public officials, and high-level protectees from various locations, including the city center, to McCormick Place and the United Center (the sites of the event) and the associated entry to the event sites on this date will require heightened security, traffic rerouting, and security checkpoints and will demand large numbers of police and other city resources. In addition to covering the entire downtown area, including the hotel zone and business district, and routing of traffic near and to McCormick Place and the United

24PA 000003 City Ex 2

Center, police and other city resources will also be required to provide protection and services to the rest of the city. Thus, sufficient city resources are not available to mitigate the traffic disruption that would be caused by the proposed parade, or to police and protect parade participants and non-participants in light of these other demands. Although your application for a parade is denied as to the precise terms of your January 8th, 2024, application, pursuant to Section 10-8-330(k) of the Municipal Code, your group is authorized to conduct a parade under the following conditions:

Date: August 19, 2024

Assembly time: 12:00pm

Step-off time: 2:00pm

Disband time: 4:00pm

Assembly area: Assemble on Columbus Dr. north of Roosevelt Rd.

Disbanding area: Jackson Dr. between Michigan and Columbus.

Route: Proceed north along Columbus Dr. from Roosevelt Rd. ending at Jackson Dr.

Pursuant to Section 10-8-330(o)(2) of the Municipal Code, "Where the parade permit was limited to the sidewalk or one lane of traffic based on the estimated number of parade participants and parade units and in the event that the number of participants in attendance exceeds anticipated levels, members of the police department are authorized to make reasonable accommodations to increase the portion of the right of way made available in order to preserve public health and safety. Alternatively, where the number or size of parade participants or parade units participating are substantially less than expected, members of the police department are authorized to limit the available portion of the public way, where one lane of traffic or the sidewalk is capable of accommodating the number of participants and parade units present."

This alternate permit only authorizes the use of the public way. To the extent your proposed event may desire to utilize the property of the Chicago Park District, another governmental entity, or a private owner, a authorization of such locations must be sought directly from the affected entity.

If you wish to accept this alternate parade permit subject to the above indicated specifications, Section 10-8-330(k) of the Municipal Code requires that you file a written notice of acceptance with the Commissioner of the City of Chicago Department of Transportation, Public Way Permit Office, 121 N. La Salle Street, Room 905, Chicago, Illinois, 60602 or email address CDOTPermitsupport@cityofchicago.org, within 5 business days of the date of this notification. Failure to provide such notice within the time provided will result in the authorization for the alternate parade permit being rescinded.

The Department of Transportation reserves the right to modify or condition any issued parade permit in light of developing circumstances and information surrounding the DNC, including circumstances outside of the City of Chicago's control, such as the logistical or security needs or plans connected with the DNC.

If you believe your application is being wrongfully denied, you may appeal this decision by filing and appeal with the Department of Administrative Hearings. Your appeal should be filed with the Director of the Department of Administrative Hearings, 740 N. Sedgwick Street, 6th Floor, Chicago, Illinois 60654. If no appeal is filed with the

24PA000003, City Ex 2.

Department of Administrative Hearings within five business days of notice of this decision, this decision shall be deemed final.

If you have any questions regarding this letter, you may contact Bryan Gallardo at 312-744-4652

Sincerely,



Bryan Gallardo
Assistant Commissioner
Public Way Permit Office
CDOT Division of Infrastructure Management

CC: Chief Devries
Deputy Chief Stevens
Cmdr. Harris
Cmdr. Barz
J. Kalayil
M. Imparato
T. Carney
A. Owens
J. Tirado
C. Pettineo
M. Peterson
T. Doran
M. Siegel
C. Hake

24PA000003, City Ex 3



REVISED DATE

APPLICATION ONLY - NOT A PERMIT

Application for a Parade Using the Public Way

Application Must Be Submitted 15 Business Days Before Event

Deliver in person or by certified mail to:

CITY OF CHICAGO - DEPARTMENT OF TRANSPORTATION
 ATTN: PUBLIC WAY PERMIT OFFICE
 CITY HALL, ROOM 905
 121 N. LA SALLE STREET, CHICAGO, ILLINOIS 60602

JAN 30 AM 11:56

DATE: 01/07/24

APPLICATION NO.: 24-24 APPLICATION FEE: \$150⁰⁰ck #
254
PAID

A non-refundable processing fee of \$50.00 must accompany the application for a parade permit unless an application for a waiver of the fee has been granted per Chicago Municipal Code section 10-8-330(r).

1. Name of Parade: March on the DNC 2024 08/22/24

Traditional Parade as defined by section 10-8-330? (x) Yes () No

2. Requested Date for Parade: 08/22/24

3. Sponsoring Organization (or Individual): Chicago Alliance Against Racist and Political Repression

Address: 6353 S Cottage Grove Avenue, Chicago, IL 60637

24-Hour Contact Number: [REDACTED]

Organization's Leader(s)/Representative(s): Kobi Guillory

4. Name of Parade Organizer/ Applicant: Kobi Guillory

Address: [REDACTED]

Email Address: [REDACTED] Fax Number: [REDACTED]

24-Hour Contact Number: [REDACTED]

5. Time Parade will start: 2:00 pm

Estimated time Parade will end*: 4:00 pm

* Per section 10-8-330(o)(1), a parade shall be no longer than 2 hours and 15 minutes, except as provided under the ordinance.

6. Time Parade will begin to assemble: 12:00

Time Parade will begin to disband: 4:30

24PA000003, City Ex 3

7. Location and exact street address of assembly area: Union Park 1501 W Randolph St., Chicago, IL 60606

Location and exact street address of disbanding area: Union Park 1501 W Randolph St., Chicago, IL 60606

Permit obtained from property owner to use assembly/disbanding area?

() Yes () No (x) Not Applicable

8. Proposed Parade Route (including sidewalks or lanes of traffic parade will occupy):

At 2:30 we will exit Union Park on the Ashland side and walk south down Ashland to Adams. We will then turn right (west) on Adams and walk to Damen, turning right (north) onto Damen we will walk to Washington and turn right (east) onto Washington, entering Park #578, arriving around 3:00pm. At 3:30 pm, we will exit Park #578 onto Wolcott, walk south to Washington, turn left (east) on Washington, and walk east on Washington to 1412 W Washington Blvd., Chicago, IL 60607. After a brief stop, we will turn around and head west down Washington back to Union Park. We will Disperse from Union Park at 4:30 pm.

9. Estimated Number of Participants: 1,000+

Basis for this estimate: Internet

10. Number of units participating in the parade:

Floats: 0

Vehicles: 0

Marching Groups: 0

11. Will animals participate in the parade? () Yes (x) No

If so, what type of animals and how many?*

*Participation of animals in a parade is governed by section 10-8-330(n)(2) of the Chicago Municipal Code.

12. Description of any sound amplification or other equipment that is on wheels or too large to be carried by one person, and a description of the size and dimension of any sign, banner, or other attention-getting device that is too large to be carried by one person:

There will be use of sound amplification devices like megaphones.

13. Ward(s) involved: 27

24PA000003, City Ex-3

TERMS AND CONDITIONS

Per section 8-4-120 of the Chicago Municipal Code, the applicant must promptly reimburse the City for any and all damage of any kind to any property of the City which may result from the use by the applicant of the City's premises under the permission granted herein, and the applicant further agrees that it will not hold liable the City for or on account of any losses or damage to property owned by it or controlled by the applicant or for or on account of any loss or damage sustained by the applicant as a result of injuries to employees or agents of the applicant.

For large parades, as a condition of the permit, it is required that the parade organizer: (1) obtain a \$1,000,000.00 commercial general liability insurance policy, naming the City as an additional insured; (2) indemnify the City against any additional and uncovered third party claims against the City arising out of or caused by the parade; and (3) agree to reimburse the City for any damage to the public way or to City property arising out of or caused by the parade.

Any person violating any of the provisions of section 10-8-330 of the Municipal Code of Chicago, shall be fined not less than \$200 nor more than \$1000 or may be subject to incarceration for up to ten days or both. In addition to any other penalty or fine provided, any person who sells or transfers a permit granted under this section shall be barred from applying for another such permit for a period of three years.

If applicant is applying on behalf of an organization, applicant warrants that he/she has authority to bind the organization listed in line 3 above. If applicant does not have such authority or if no organization is involved, applicant agrees that this application is made on his/her own behalf and is binding on applicant.

Any change in information on this application shall be reported to the Commissioner immediately.

Signature: _____

Date: 01/07/24

Printed Name: Kobi Guillory

Title/Position(if any): Co-Chair

Telephone number: _____

E-Mail Address: _____

24PA000003, City Ex 4



CHICAGO DEPARTMENT OF TRANSPORTATION
CITY OF CHICAGO

February 1, 2024

March on the DNC 2024
C/O Kobi Guillory
6227 S Langley
Chicago, IL 60637

Dear Mr. Guillory,

Pursuant to subsection 10-8-330(d)(1); 10-8-330 (d)(3) and 10-8-330(d)(4) of the Municipal Code of Chicago ("Code"), your application dated January 30, 2024, for a parade on August 22, 2024, is disregarded and denied for the following reasons:

1. Under section 10-8-330(d)(1) No person or organization may submit more than one application for the same parade date and route, or for a parade substantially similar in theme or units described but requesting an alternate date or route, whether using the same name, different names, or different affiliations that the person or organization may control or be a member of.
2. Under section 10-8-330(d)(3) Where a person or organization submits multiple applications for the same parade date and route, or for a parade substantially similar in theme or units described but requesting an alternate date or route, whether by using one name or multiple names, that person or organization shall not be eligible for such a permit and shall be in violation of this ordinance.
3. Under section 10-8-330(d)(4) The commissioner is authorized to disregard any such multiple applications and to deny any permit on the basis of a violation of this subsection.

If you believe your application is being wrongfully denied, you may appeal this decision by filing and appeal with the Department of Administrative Hearings. Your appeal should be filed with the Director of the Department of Administrative Hearings, 740 N. Sedgwick Street, 6th Floor, Chicago, Illinois 60654. If no appeal is filed with the Department of Administrative Hearings within five business days of notice of this decision, this decision shall be deemed final.

If you have any questions regarding this letter, you may contact Bryan Gallardo at 312-744-4652

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Gallardo", is written over a horizontal line.

Bryan Gallardo
Assistant Commissioner
Public Way Permit Office

24PA000003, City Ex 4.

CDOT Division of Infrastructure Management

CC: Chief Devries
Deputy Chief Stevens
Cmdr. Harris
Cmdr. Barz
J. Kalayil
M. Imparato
T. Carney
A. Owens
J. Tirado
C. Pettineo
M. Peterson
T. Doran
M. Siegel
C. Hake

105

IN THE CITY OF CHICAGO
DEPARTMENT OF ADMINISTRATIVE HEARINGS

HEARINGS DIVISION
SECTION

CITY OF CHICAGO, a Municipal Corporation)
(by the Department of _____))

Petitioner,)

v.)

CAARPR

Marchon DNC 2024

Respondent,)

Docket #

24 PA 3

Citation #

APPEARANCE FOR RESPONDENT

I, Daniel Massoglin, enter my appearance on behalf of the above-captioned Respondent and further state, under oath and upon penalty of law, that:

IF RESPONDENT IS AN INDIVIDUAL, PLEASE SELECT ONE OF THE FOLLOWING:

☐ I am the above-captioned Respondent

☐ I am the attorney for the above-captioned Respondent, with authority to represent Respondent in this proceeding

☐ I am not the above-captioned Respondent, nor the attorney for Respondent. I have been expressly authorized by Respondent to appear on Respondent's behalf in this proceeding

☐ None of the above (please explain) _____

***PLEASE SIGN, DATE, AND COMPLETE ADDRESS/PHONE INFORMATION BELOW

IF RESPONDENT IS A CORPORATION, PLEASE SELECT ONE OF THE FOLLOWING:

☐ I am a president, vice-president, registered agent, director, manager, department manager, supervisor, or other person responsible for managing the affairs of the above-captioned Respondent and have authority to represent Respondent in this proceeding

☒ I am the attorney for the above-captioned Respondent, with authority to represent Respondent in this proceeding

☐ I am not the attorney for the above-captioned respondent, nor a person responsible for managing the Respondent's affairs. I have been expressly authorized by Respondent to appear on Respondent's behalf in this proceeding.

☐ None of the above (please explain) _____

***PLEASE SIGN, DATE, AND COMPLETE ADDRESS/PHONE INFORMATION BELOW

Signature

Daniel Massoglin

Address

601 S. California Ave

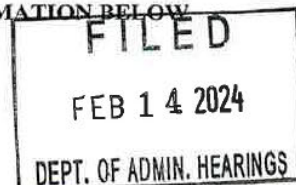
City, State, Zip

Chicago, IL 60612

Date

()

Phone #



REV: 07/24/2018

24PA3 File-000028

105

IN THE CITY OF CHICAGO
DEPARTMENT OF ADMINISTRATIVE HEARINGS

HEARINGS DIVISION
 SECTION

CITY OF CHICAGO, a Municipal Corporation)
 (by the Department of _____))
)
) Petitioner,)
)
) v.)
)
Chicago Alliance Against)
Racist & Political Repression)
) Respondent,)

Docket # _____

Citation # 24PA003

APPEARANCE FOR RESPONDENT

I, Makellie Townsend, enter my appearance on behalf of the above-captioned Respondent and further state, under oath and upon penalty of law, that:

IF RESPONDENT IS AN INDIVIDUAL, PLEASE SELECT ONE OF THE FOLLOWING:

- ☐ I am the above-captioned Respondent
- ☒ I am the attorney for the above-captioned Respondent, with authority to represent Respondent in this proceeding
- ☐ I am not the above-captioned Respondent, nor the attorney for Respondent. I have been expressly authorized by Respondent to appear on Respondent's behalf in this proceeding
- ☐ None of the above (please explain) _____

*****PLEASE SIGN, DATE, AND COMPLETE ADDRESS/PHONE INFORMATION BELOW**

IF RESPONDENT IS A CORPORATION, PLEASE SELECT ONE OF THE FOLLOWING:

- ☐ I am a president, vice-president, registered agent, director, manager, department manager, supervisor, or other person responsible for managing the affairs of the above-captioned Respondent and have authority to represent Respondent in this proceeding
- ☐ I am the attorney for the above-captioned Respondent, with authority to represent Respondent in this proceeding
- ☐ I am not the attorney for the above-captioned respondent, nor a person responsible for managing the Respondent's affairs. I have been expressly authorized by Respondent to appear on Respondent's behalf in this proceeding.
- ☐ None of the above (please explain) _____

*****PLEASE SIGN, DATE, AND COMPLETE ADDRESS/PHONE INFORMATION BELOW**

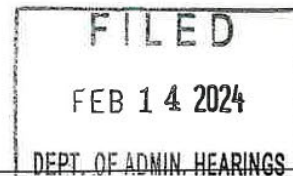
Signature

5510 N Kenmore Ave Apt 215

Address

Chicago, IL 60640

City, State, Zip



Date

(85) 878-1841

Phone #

REV: 07/24/2018

24PA3 File-000029

105

IN THE CITY OF CHICAGO
DEPARTMENT OF ADMINISTRATIVE HEARINGS

HEARINGS DIVISION
SECTION

CITY OF CHICAGO, a Municipal Corporation)
(by the Department of _____))

Petitioner,)

v.)

Chicago Alliance Against Racist
And Political Repression
"CAARPR"))

March on the DNC 2024 Respondent,)

Docket #

24 PA 000003

Citation #

APPEARANCE FOR RESPONDENT

I, Jacqueline Spreadbury, enter my appearance on behalf of the above-captioned Respondent and further state, under oath and upon penalty of law, that:

IF RESPONDENT IS AN INDIVIDUAL, PLEASE SELECT ONE OF THE FOLLOWING:

☐ I am the above-captioned Respondent

☒ I am the attorney for the above-captioned Respondent, with authority to represent Respondent in this proceeding

☐ I am not the above-captioned Respondent, nor the attorney for Respondent. I have been expressly authorized by Respondent to appear on Respondent's behalf in this proceeding

☐ None of the above (please explain) _____

***PLEASE SIGN, DATE, AND COMPLETE ADDRESS/PHONE INFORMATION BELOW

IF RESPONDENT IS A CORPORATION, PLEASE SELECT ONE OF THE FOLLOWING:

☐ I am a president, vice-president, registered agent, director, manager, department manager, supervisor, or other person responsible for managing the affairs of the above-captioned Respondent and have authority to represent Respondent in this proceeding

☐ I am the attorney for the above-captioned Respondent, with authority to represent Respondent in this proceeding

☐ I am not the attorney for the above-captioned respondent, nor a person responsible for managing the Respondent's affairs. I have been expressly authorized by Respondent to appear on Respondent's behalf in this proceeding.

☐ None of the above (please explain) _____

***PLEASE SIGN, DATE, AND COMPLETE ADDRESS/PHONE INFORMATION BELOW

Signature

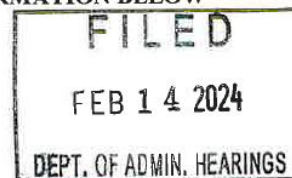
Address

City, State, Zip

Date

()

Phone #



REV: 07/24/2018

24PA3 File-000030

Patricia Jackowiak

From: Patricia Jackowiak
Sent: Thursday, February 8, 2024 12:59 PM
To: [REDACTED] Thomas Doran
Subject: 24PA000003
Attachments: 3080_001.pdf

Attached please find the Notice of Hearing for the above-captioned matter.

Patricia Jackowiak
Commissioner/Chief Administrative Judge
City of Chicago
Department of Administrative Hearings



**DEPARTMENT OF ADMINISTRATIVE HEARINGS
CITY OF CHICAGO**

NOTICE OF HEARING

February 8, 2024

To: March on the DNC 2024 / March on the DNC 2024 08/22/24
C/O Joe Iosbaker
6353 S. Cottage Grove Avenue
Chicago, Illinois 60637
[REDACTED]

Thomas Doran
City of Chicago
Department of Law
Thomas.Doran@cityofchicago.org

Re: Parade Applications for "March on the DNC"
Docket 24 PA 000003

Please be advised that the hearing you requested to contest the denial of your parade permit applications will occur at the time and location listed below:

Date: February 14, 2024
Time: 9:00 a.m.
Location: Department of Administrative Hearings
Central Hearing Facility
400 West Superior, Room 105
Chicago, IL 60654

Please bring all witnesses, evidence, or documents to this hearing.

IF YOU FAIL TO APPEAR, A HEARING WILL BE CONDUCTED IN YOUR ABSENCE AND MAY RESULT IN THE DECISION OF THE COMMISSIONER BEING AFFIRMED.

CERTIFICATION OF SERVICE

I, Patricia Jackowiak, hereby certify that I served a copy of this Notice of Hearing to the above-named individuals via email to the addresses listed above on February 8, 2024.


PATRICIA JACKOWIAK
Print Name

Joe Iosbaker
joe iosbaker@gmail.com
773-301-0109



Chicago Alliance Against Racist & Political Repression

6353 S. Cottage Grove Ave. Chicago IL 60637 (312) 939-2750

www.caarpr.org

February 7, 2024

Department of Administrative Hearings
740 N. Sedgwick Street, 6th Floor
Chicago, IL 60654
Via in-person delivery

To Whom It May Concern:

Pursuant to Chicago Municipal Code 10-8-330, subsection (l)(1), we are appealing the Department of Transportation's rejection of our parade permit application.

A copy of our Applications (Exhibit 1 and Exhibit 2) as originally submitted are attached.

Copies of both denial letters are attached here as well (Exhibit 2 & Exhibit 3).

I look forward to hearing from you shortly.

Sincerely,

Joe Iosbaker
Labor Committee Co-Chair

Executive Committee

Kobi Guillory

Shasta Jones

Dod McColgan

Co-Chairs

Grace Patino

Treasurer

Frank Chapman

Field Secretary,

Education Director

Willie Williamson

Finance Committee Chair

Joe Iosbaker & Regina Russell

Labor Committee Co-Chairs

Kevin Lindemann

Recording Secretary

Dod McColgan & Alec Osawa

Media Committee

Merawi Gerima & Jasmine Smith

Campaign to Free

Incarcerated Survivors of

Police Torture (CFIST)

Shasta Jones

Stop Police Crimes

Committee Chair

Ted Pearson, Regina Russell &

Armanda Shackelford

Co-Chairpersons Emeritus

In Memoriam:

Josephine Wyatt 1921-2017

Founding member

Clarice Durham 1919-2018

Co-Chair for 25 years

Steering Committee

Hatem Abudayyeh

Arab-American Action

Network

Nerissa Allegretti

National Alliance for

Filipino Concerns (NAFCON)

Brenetta Howell Barrett

Chicago Committee to

Defend the Bill of Rights

Craig Futterman, General Counsel

Clinical Professor of Law

University of Chicago School

of Law

Terrance Chism

President, Chicago 400

Alliance

Joe Iosbaker

Committee To Stop

FBI Repression

Amika Tendaji

Black Lives Matter

Johnnie Veal

United Minds Program

In Memoriam:

Judith Stuart

Prison Medical Project

FILED
2024 FEB - 7 PM 3:54
CITY OF CHICAGO
DEPT. OF ADMIN. HEARINGS

UNITY + STRUGGLE + ORGANIZATION = VICTORIES!

Exhibit 1

APPLICATION ONLY - NOT A PERMIT
Application for a Parade Using the Public Way



Application Must Be Submitted 15 Business Days Before Event

Deliver in person or by certified mail to:

CITY OF CHICAGO - DEPARTMENT OF TRANSPORTATION
 ATTN: PUBLIC WAY PERMIT OFFICE
 CITY HALL, ROOM 905
 121 N. LA SALLE STREET, CHICAGO, ILLINOIS 60602

DATE: 11/09/2023

APPLICATION NO.: _____ APPLICATION FEE: _____

A non-refundable processing fee of \$50.00 must accompany the application for a parade permit unless an application for a waiver of the fee has been granted per Chicago Municipal Code section 10-8-330(r).

1. Name of Parade: March On the DNC 2024

Traditional Parade as defined by section 10-8-330? () Yes (X) No

2. Requested Date for Parade: 08/19/2024

3. Sponsoring Organization (or Individual): Chicago Alliance Against Racist and Political Repression

Address: 6353 S Cottage Grove Avenue, Chicago, IL 60637

24-Hour Contact Number: [REDACTED]

Organization's Leader(s)/Representative(s): Kobi Guillory

4. Name of Parade Organizer/ Applicant: Kobi Guillory

Address: [REDACTED]

Email Address: [REDACTED] Fax Number: _____

24-Hour Contact Number: [REDACTED]

5. Time Parade will start: 2:00 pm

Estimated time Parade will end*: 4:00 pm

* Per section 10-8-330(o)(1), a parade shall be no longer than 2 hours and 15 minutes, except as provided under the ordinance.

6. Time Parade will begin to assemble: 12:00 pm

Time Parade will begin to disband: 4:30 pm



7. Location and exact street address of assembly area: Union Park, 1501 W Randolph St, Chicago, IL 60606

Location and exact street address of disbanding area: _____

Union Park, 1501 W Randolph St, Chicago, IL 60606

Permit obtained from property owner to use assembly/disbanding area?

() Yes () No (X) Not Applicable

8. Proposed Parade Route (including sidewalks or lanes of traffic parade will occupy): _____

At 2:30 we will exit Union Park on the Ashland side and walk south down Ashland to Adams. We will then turn right (west) on Adams and walk to Damen, turning right (north) onto Damen we will walk to Washington and turn right (east) onto Washington, entering Park #578, arriving around 3:00pm. At 3:30 pm, we will exit Park #578 onto Wolcott, walk south to Washington, turn left (east) on Washington, and walk east on Washington to 1412 W Washington Blvd., Chicago, IL 60607. After a brief stop, we will turn around and head west down Washington back to Union Park. We will Disperse from Union Park at 4:30 pm.

9. Estimated Number of Participants: 1,000+

Basis for this estimate: _____

10. Number of units participating in the parade:

Floats: 0

Vehicles: 0

Marching Groups: 0

11. Will animals participate in the parade? () Yes (X) No

If so, what type of animals and how many?*

Service animal may be present.

*Participation of animals in a parade is governed by section 10-8-330(n)(2) of the Chicago Municipal Code.

12. Description of any sound amplification or other equipment that is on wheels or too large to be carried by one person, and a description of the size and dimension of any sign, banner, or other attention-getting device that is too large to be carried by one person:

13. Ward(s) involved: 27

2024 FEB - 7 PM 3:55
 CITY OF CHICAGO
 DEPT. OF ADMIN. HEARINGS
 FILED

TERMS AND CONDITIONS

Per section 8-4-120 of the Chicago Municipal Code, the applicant must promptly reimburse the City for any and all damage of any kind to any property of the City which may result from the use by the applicant of the City's premises under the permission granted herein, and the applicant further agrees that it will not hold liable the City for or on account of any losses or damage to property owned by it or controlled by the applicant or for or on account of any loss or damage sustained by the applicant as a result of injuries to employees or agents of the applicant.

For large parades, as a condition of the permit, it is required that the parade organizer: (1) obtain a \$1,000,000.00 commercial general liability insurance policy, naming the City as an additional insured; (2) indemnify the City against any additional and uncovered third party claims against the City arising out of or caused by the parade; and (3) agree to reimburse the City for any damage to the public way or to City property arising out of or caused by the parade.

Any person violating any of the provisions of section 10-8-330 of the Municipal Code of Chicago, shall be fined not less than \$200 nor more than \$1000 or may be subject to incarceration for up to ten days or both. In addition to any other penalty or fine provided, any person who sells or transfers a permit granted under this section shall be barred from applying for another such permit for a period of three years.

If applicant is applying on behalf of an organization, applicant warrants that he/she has authority to bind the organization listed in line 3 above. If applicant does not have such authority or if no organization is involved, applicant agrees that this application is made on his/her own behalf and is binding on applicant.

Any change in information on this application shall be reported to the Commissioner immediately.

Signature:  Date: 11/09/2023

Printed Name: Kobi Guillory

Title/Position(if any): Co-Chair

Telephone number [REDACTED] E-Mail Address: [REDACTED]

FILED
2024 FEB - 7 PM 3:55
CITY OF CHICAGO
DEPT. OF ADMIN. HEARINGS



Exhibit 2

APPLICATION ONLY - NOT A PERMIT

Application for a Parade Using the Public Way

Application Must Be Submitted 15 Business Days Before Event

Deliver in person or by certified mail to:

CITY OF CHICAGO - DEPARTMENT OF TRANSPORTATION
ATTN: PUBLIC WAY PERMIT OFFICE
CITY HALL, ROOM 905
121 N. LA SALLE STREET, CHICAGO, ILLINOIS 60602

DATE: 01/07/24

APPLICATION NO.: _____ APPLICATION FEE: _____

A non-refundable processing fee of \$50.00 must accompany the application for a parade permit unless an application for a waiver of the fee has been granted per Chicago Municipal Code section 10-8-330(r).

1. Name of Parade: March on the DNC 2024 08/22/24

Traditional Parade as defined by section 10-8-330? (x) Yes () No

2. Requested Date for Parade: 08/22/243. Sponsoring Organization (or Individual): Chicago Alliance Against Racist and Political RepressionAddress: 6353 S Cottage Grove Avenue, Chicago, IL 6063724-Hour Contact Number: [REDACTED]Organization's Leader(s)/Representative(s): Kobi Guillory4. Name of Parade Organizer/ Applicant: Kobi GuilloryAddress: [REDACTED]Email Address: [REDACTED] Fax Number: _____24-Hour Contact Number: [REDACTED]5. Time Parade will start: 2:00 pmEstimated time Parade will end*: 4:00 pm

* Per section 10-8-330(o)(1), a parade shall be no longer than 2 hours and 15 minutes, except as provided under the ordinance.

6. Time Parade will begin to assemble: 12:00Time Parade will begin to disband: 4:30

7. Location and exact street address of assembly area: Union Park 1501 W Randolph St., Chicago, IL 60606

Location and exact street address of disbanding area: Union Park 1501 W Randolph St., Chicago, IL 60606

Permit obtained from property owner to use assembly/disbanding area?

() Yes () No (x) Not Applicable

8. Proposed Parade Route (including sidewalks or lanes of traffic parade will occupy):

At 2:30 we will exit Union Park on the Ashland side and walk south down Ashland to Adams. We will then turn right (west) on Adams and walk to Damen, turning right (north) onto Damen we will walk to Washington and turn right (east) onto Washington, entering Park #578, arriving around 3:00pm. At 3:30 pm, we will exit Park #578 onto Wolcott, walk south to Washington, turn left (east) on Washington, and walk east on Washington to 1412 W Washington Blvd., Chicago, IL 60607. After a brief stop, we will turn around and head west down Washington back to Union Park. We will Disperse from Union Park at 4:30 pm.

9. Estimated Number of Participants: 1,000+

Basis for this estimate: Internet

10. Number of units participating in the parade:

Floats: 0

Vehicles: 0

Marching Groups: 0

11. Will animals participate in the parade? () Yes (x) No

If so, what type of animals and how many?*

*Participation of animals in a parade is governed by section 10-8-330(n)(2) of the Chicago Municipal Code.

12. Description of any sound amplification or other equipment that is on wheels or too large to be carried by one person, and a description of the size and dimension of any sign, banner, or other attention-getting device that is too large to be carried by one person:

There will be use of sound amplication devices like megaphones.

13. Ward(s) involved: 27

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CITY OF CHICAGO
DEPT. OF ADMIN. SERVICES

TERMS AND CONDITIONS

Per section 8-4-120 of the Chicago Municipal Code, the applicant must promptly reimburse the City for any and all damage of any kind to any property of the City which may result from the use by the applicant of the City's premises under the permission granted herein, and the applicant further agrees that it will not hold liable the City for or on account of any losses or damage to property owned by it or controlled by the applicant or for or on account of any loss or damage sustained by the applicant as a result of injuries to employees or agents of the applicant.

For large parades, as a condition of the permit, it is required that the parade organizer: (1) obtain a \$1,000,000.00 commercial general liability insurance policy, naming the City as an additional insured; (2) indemnify the City against any additional and uncovered third party claims against the City arising out of or caused by the parade; and (3) agree to reimburse the City for any damage to the public way or to City property arising out of or caused by the parade.

Any person violating any of the provisions of section 10-8-330 of the Municipal Code of Chicago, shall be fined not less than \$200 nor more than \$1000 or may be subject to incarceration for up to ten days or both. In addition to any other penalty or fine provided, any person who sells or transfers a permit granted under this section shall be barred from applying for another such permit for a period of three years.

If applicant is applying on behalf of an organization, applicant warrants that he/she has authority to bind the organization listed in line 3 above. If applicant does not have such authority or if no organization is involved, applicant agrees that this application is made on his/her own behalf and is binding on applicant.

Any change in information on this application shall be reported to the Commissioner immediately.

Signature: _____ Date: 01/07/24

Printed Name: Kobi Guillory

Title/Position(if any): Co-Chair

Telephone number: [REDACTED] E-Mail Address: [REDACTED]

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CITY OF CHICAGO
DEPT. OF ADMIN. HEARINGS

Exhibit 3



CHICAGO DEPARTMENT OF TRANSPORTATION
CITY OF CHICAGO

January 22, 2024

March on the DNC 2024
C/O Kobi Guillory
6227 S Langley
Chicago, IL 60637

Dear Mr. Guillory,

Pursuant to subsection 10-8-330(g) of the Municipal Code of Chicago ("Code"), your application dated January 8, 2024, for a parade on August 19, 2024, is denied for the following reasons:

1. Under section 10-8-330(g)(1) of the Code, the Commissioner finds that the proposed parade will substantially and unnecessarily interfere with traffic in the area contiguous to the activity, and there are not available at the time of the proposed parade sufficient city resources to mitigate the disruption.
2. Under section 10-8-330(g)(2) of the Code, the Commissioner finds that there are not available at the time of the parade a sufficient number of on-duty police officers, or other city employees, authorized to regulate traffic, to police the public, and to protect parade participants and non-participants from traffic-related hazards because of the other requirements for police protection during the time of the proposed parade.

The Commissioner's decision is based on a number of factors, including, but not limited to the following: on the week in question, Chicago will host the 2024 Democratic National Convention (DNC), a large presidential nominating convention that will involve the attendance of delegates from all 50 states, the District of Columbia, and U.S. territories. Additionally, many high-level protectees, including President Biden, and other political leaders will attend the convention. Motorcades for DNC attendees will create significant traffic impediments and safety issues that will not permit the proposed parade route to occur. Moreover, the proposed parade route winds through the city center on a day many attendees are expected to arrive and would create significant traffic concerns and a drain on existing police resources. Movement of up to 50,000 delegates, staff, public officials, and high-level protectees from various locations, including the city center, to McCormick Place and the United Center (the sites of the event) and the associated entry to the event sites on this date will require heightened security, traffic rerouting, and security checkpoints and will demand large numbers of police and other city resources. In addition to covering the entire downtown area, including the hotel zone and business district, and routing of traffic near and to McCormick Place and the United

Center, police and other city resources will also be required to provide protection and services to the rest of the city. Thus, sufficient city resources are not available to mitigate the traffic disruption that would be caused by the proposed parade, or to police and protect parade participants and non-participants in light of these other demands. Although your application for a parade is denied as to the precise terms of your January 8th, 2024, application, pursuant to Section 10-8-330(k) of the Municipal Code, your group is authorized to conduct a parade under the following conditions:

Date: August 19, 2024

Assembly time: 12:00pm

Step-off time: 2:00pm

Disband time: 4:00pm

Assembly area: Assemble on Columbus Dr. north of Roosevelt Rd.

Disbanding area: Jackson Dr. between Michigan and Columbus.

Route: Proceed north along Columbus Dr. from Roosevelt Rd. ending at Jackson Dr.

Pursuant to Section 10-8-330(o)(2) of the Municipal Code, "Where the parade permit was limited to the sidewalk or one lane of traffic based on the estimated number of parade participants and parade units and in the event that the number of participants in attendance exceeds anticipated levels, members of the police department are authorized to make reasonable accommodations to increase the portion of the right of way made available in order to preserve public health and safety. Alternatively, where the number or size of parade participants or parade units participating are substantially less than expected, members of the police department are authorized to limit the available portion of the public way, where one lane of traffic or the sidewalk is capable of accommodating the number of participants and parade units present."

This alternate permit only authorizes the use of the public way. To the extent your proposed event may desire to utilize the property of the Chicago Park District, another governmental entity, or a private owner, authorization of such locations must be sought directly from the affected entity.

If you wish to accept this alternate parade permit subject to the above indicated specifications, Section 10-8-330(k) of the Municipal Code requires that you file a written notice of acceptance with the Commissioner of the City of Chicago Department of Transportation, Public Way Permit Office, 121 N. La Salle Street, Room 905, Chicago, Illinois, 60602 or email address CDOTPermitsupport@cityofchicago.org, within 5 business days of the date of this notification. Failure to provide such notice within the time provided will result in the authorization for the alternate parade permit being rescinded.

The Department of Transportation reserves the right to modify or condition any issued parade permit in light of developing circumstances and information surrounding the DNC, including circumstances outside of the City of Chicago's control, such as the logistical or security needs or plans connected with the DNC.

If you believe your application is being wrongfully denied, you may appeal this decision by filing and appeal with the Department of Administrative Hearings. Your appeal should be filed with the Director of the Department of Administrative Hearings, 740 N. Sedgwick Street, 6th Floor, Chicago, Illinois 60654. If no appeal is filed with the

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Department of Administrative Hearings within five business days of notice of this decision, this decision shall be deemed final.

If you have any questions regarding this letter, you may contact Bryan Gallardo at 312-744-4652

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Gallardo", with a long horizontal flourish extending to the right.

Bryan Gallardo
Assistant Commissioner
Public Way Permit Office
CDOT Division of Infrastructure Management

CC: Chief Devries
Deputy Chief Stevens
Cmdr. Harris
Cmdr. Barz
J. Kalayil
M. Imparato
T. Carney
A. Owens
J. Tirado
C. Pettineo
M. Peterson
T. Doran
M. Siegel
C. Hake



Exhibit 4

CHICAGO DEPARTMENT OF TRANSPORTATION
CITY OF CHICAGO

February 1, 2024

March on the DNC 2024
C/O Kobi Guillory
6227 S Langley
Chicago, IL 60637

Dear Mr. Guillory,

Pursuant to subsection 10-8-330(d)(1); 10-8-330 (d)(3) and 10-8-330(d)(4) of the Municipal Code of Chicago ("Code"), your application dated January 30, 2024, for a parade on August 22, 2024, is disregarded and denied for the following reasons:

1. Under section 10-8-330(d)(1) No person or organization may submit more than one application for the same parade date and route, or for a parade substantially similar in theme or units described but requesting an alternate date or route, whether by using the same name, different names, or different affiliations that the person or organization may control or be a member of.
2. Under section 10-8-330(d)(3) Where a person or organization submits multiple applications for the same parade date and route, or for a parade substantially similar in theme or units described but requesting an alternate date or route, whether by using one name or multiple names, that person or organization shall not be eligible for such a permit and shall be in violation of this ordinance.
3. Under section 10-8-330(d)(4) The commissioner is authorized to disregard any such multiple applications and to deny any permit on the basis of a violation of this subsection.

If you believe your application is being wrongfully denied, you may appeal this decision by filing an appeal with the Department of Administrative Hearings. Your appeal should be filed with the Director of the Department of Administrative Hearings, 740 N. Sedgwick Street, 6th Floor, Chicago, Illinois 60654. If no appeal is filed with the Department of Administrative Hearings within five business days of notice of this decision, this decision shall be deemed final.

If you have any questions regarding this letter, you may contact Bryan Gallardo at 312-744-4652

Sincerely,

Bryan Gallardo
Assistant Commissioner
Public Way Permit Office

CDOT Division of Infrastructure Management

CC: Chief Devries
Deputy Chief Stevens
Cmdr. Harris
Cmdr. Barz
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A. Owens
J. Tirado
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M. Peterson
T. Doran
M. Siegel
C. Hake

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